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January 14, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: US Department of Transportation's Petition for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide, CC Docket No. 92-105; NSD-L-99-24.
Ex Parte Presentation

Dear Ms. Salas:

On Thursday, January 13, 2000, Mary Peters and Tim Wolfe of the Arizona Department of Transportation and Doug Povich of Squire, Sanders & Dempsey, LLP, counsel to ITS America, met with Rebecca Benyon, Legal Advisor, Common Carrier Issues, to Commissioner Harold Furchtgott-Roth.

The parties discussed the status of CC Docket No. 92-105;NSD-L-99-24, ITS America's submission to and position regarding the Docket and related issues. A copy of the document given to Ms. Benyon reflecting the substance of these comments is included with this letter.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter are being filed with your office for inclusion in the public record in the above-proceeding. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Mark D. Johnson
Deputy General Counsel
ITS America

attachment

cc: Rebecca Benyon, Legal Advisor, Common Carrier Matters, Office of Commissioner Furchtgott-Roth
Mary Peters, Director, Arizona Department of Transportation
Doug Povich, Partner, Squire, Sanders & Dempsey, LLP

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Issue Paper on N11 Petition Before the FCC
Provided by ITS America
January 13, 2000

Summary

The travelling public can now access current traffic information and other traveler services simply by using their telephone from home, work, hotel or even in their car. This service is made possible by the use of new communications and computer technologies that are being applied to highways and transit systems to save the lives, time and money of the travelling public.

Despite the proliferation of these new technologies, there remains a serious obstacle for greater use by the public of these traveler information services: the lack of a common, national telephone number between cities, in rural regions and even within a single metropolitan area.

This problem has been exacerbated by the proliferation of cellular services and new area codes. For example, in the Washington, DC to New York City corridor there are eleven, different telephone numbers the public can use for traffic and traveler information. Studies and small, local programs have shown that the number of calls made to a traveler information service increase significantly when an abbreviated number – such as 211 – is available.

US DOT's Petition to the FCC: In March 1999, the US Department of Transportation petitioned (CC Docket No. 92-105; NSD-L-24) the Federal Communications Commission for the adoption of a new, national three-digit telephone number – similar to 911 – giving drivers nationwide access to traffic and traveler information on traffic conditions, bad weather, construction or traffic jams as well as local public transportation schedules. The comment and reply periods closed September, 1999.

Background Facts and Issues

Clear Public Need: All the statistics point to great increases in miles traveled with resulting increases in congestion. At the same time, construction of new roads and highways has not kept pace. Providing accurate and timely traffic and traveler information, however, has been shown to reduce congestion, improve travel times and reduce the number of accidents.

Clear Public Benefit: A national, three-digit number for traffic and traveler information would be accessible to all segments of the travelling public, regardless of economic status, place of residence or means of travel. Other proposed uses for three-digit numbers would not reach similar numbers of the general public.

Clear Public Demand: Local traffic and traveler information providers already report heavy demand by the public for services. Existing Infrastructure and Relationships There already is an existing – and growing – infrastructure in place in most states and many metropolitan areas that is providing traffic and traveler information to the public through the telephone. Moreover, public

agencies and governments have forged the institutional relationships to make these services possible. What is lacking is a common number to make public access easier. In fact, many of the current services are prepared to migrate to a three-digit number soon after one is available.

Local Implementation: As has been the case with 911 services, it is expected that implementation of a three-digit number for traffic and traveler information services will vary from location to location. States and local jurisdictions would retain authority over funding, form of infrastructure, scope of services, and institutional relationships to reflect local needs and abilities.

Public Dollars at Use: Traffic and traveler information services are supported by federal, state and local government funding.

Public Response: Where a three-digit number has been made available for traffic and traveler information, the number of calls has increased significantly while the number of non-emergency 911 calls have lessened significantly.

Public Education: Because of the current proliferation of traffic and traveler information services, the public is already familiar with their concept, use and benefits. Therefore, switching to a national, three-digit number for these services will require only modest investments in public education. A national, three-digit number will also make it less costly to educate the public on new services being deployed in new areas because of nationwide public awareness and use.

Recognized Public Service: Three-digit numbers, such as 911 and 411, are already recognized as public services available to the entire population. A three-digit traffic and traveler information number would benefit from and enhance this perception of a scarce, public resource.

New Area Codes: The proliferation of new area codes to meet increased demand for phone service has made it all but impossible for public agencies to acquire a common five-digit or ten-digit number across a region, within a state or between bordering states.

Local Unfamiliarity: Travelers, such as tourists or long-haul commercial drivers, unfamiliar with a city, region or rural area are fundamentally shut out from accessing local traffic and traveler information services. A national, three-digit number would permit all travelers to access these services wherever available.

Technology Neutral: A national, three-digit number for traffic and traveler information services does not favor one technology, such as wireless over wireline, or vice versa. Such a number would be accessible whether from a cellular phone in a car or from a home, office or hotel.

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